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June 7, 2004

Mr. Peter Mannino
Emergency and Remedial Response Division
U.S. Environmental Protection Agency -
Region II
290 Broadway - 19th Floor
New York, New York 10007

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**Re: Response to Request for Information Pursuant to Section 104 of
CERCLA for Cornell-Dubilier Electronics, Inc. Site in Middlesex
County, New Jersey**

Dear Mr. Mannino:

I am writing on behalf of Scott Technologies, Inc., formerly known as S-P Manufacturing, Inc. (the "Company") in response to the U.S. Environmental Protection Agency's Request for Information about the Cornell-Dubilier Superfund Site in Middlesex County, New Jersey (the "Site").

• Before addressing the specific questions, I would like to provide you with background information on the Company's relationship with S-P Manufacturing, Inc. ("SP"). On December 22, 1986, twenty years after SP was purported to have been at the Site, the Company, then known as Figgie International, Inc., acquired the stock of SP from a number of individual shareholders. Based on our review of available information, SP had no real property or operations in New Jersey at the time of the Company's acquisition. On August 4, 1995, the Company sold all of its remaining SP-related assets to Illinois Toolworks, an Illinois corporation, and its wholly-owned subsidiary, N.A. Woodworth Company, a Michigan corporation. Based on our review of available information, no New Jersey real property or operations were transferred in connection with the Company's sale of the SP assets.

In preparing this response, we reviewed all SP-related business and corporate records in the Company's possession, which amounted to four cartons and six dossiers of documents. Almost all of this information was corporate documentation relating to the Company's purchase and sale transactions in 1986 and 1995. The Company was unable to identify any information relating to the environmental operations or environmental business records of the SP business, nor

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any information regarding SP's involvement with or connection to the Site. In addition, we contacted one former Company employee who, as it turns out, had no knowledge of SP's operations at the Site.

In summary, the Company did not own SP during the period in question and has been unable to identify any information connecting SP in any way to the Site or even to New Jersey.

Scott Technologies, Inc. Response to Request for Information

1.

- a. *State the legal name and mailing address of the Company.*

Scott Technologies, Inc.
f/k/a S-P Manufacturing, Inc.
One Chagrin Highlands
2000 Auburn Drive
Beachwood, OH 44122

Unless otherwise indicated, all individuals named in this Response to Question 1 can be contacted via this address.

- b. *State the name(s) and address(es) of the current (or most recent) President, Chairman of the Board and Chief Executive Officer (or other presiding officer) of the company.*

The President of the Company is David E. Robinson. The Company has no Chairman of the Board or Chief Executive Officer ("CEO").

- c. *State the legal form of business of the Company (e.g., corporation, partnership, etc.). If the Company is a corporation, identify the state and date of incorporation and the agent for service of process in the state of incorporation and in New Jersey.*

The Company is a Delaware corporation, originally incorporated on May 11, 1983 as Figgie International Holdings Inc. CT Corporation is the agent for service of process in Delaware and New Jersey.

- d. *If the Company is a subsidiary or affiliate of another corporation, or has subsidiaries, identify each such entity and its relationship to the Company, and state the name(s) and address(es) of each such entity's President, Chairman of the*

Board and Chief Executive Officer. Identify the state and date of incorporation and the agent for service of process in the state of incorporation and in New Jersey for each entity identified in the response to this question.

The Company is a subsidiary of Scott Technologies Holdings, Inc., a Nevada corporation incorporated on October 13, 2000. CT Corporation is the agent for service upon Scott Technology Holdings, Inc. in Nevada and New Jersey. The President of Scott Technology Holdings, Inc. is Edward D. Breen, but this company has no CEO or Chairman of the Board.

The Company has the following wholly-owned U.S. subsidiaries:

Willoughby Holdings Inc., a Delaware corporation incorporated on November 14, 1983. CT Corporation is the agent for service for this subsidiary in Delaware. This subsidiary is not licensed to do business in New Jersey. The President of this subsidiary is Edward D. Breen. This subsidiary has no CEO or Chairman of the Board.

Scott Aviation, Inc., a Delaware corporation incorporated on March 4, 2004. CT Corporation is the agent for service for this subsidiary in Delaware. This subsidiary is not licensed to do business in New Jersey. The President of this subsidiary David E. Robinson. This subsidiary has no CEO or Chairman of the Board.

Figgie Leasing Corporation, a Delaware corporation incorporated on September 26, 1983. CT Corporation is the agent for service for this subsidiary in Delaware. This subsidiary is not licensed to do business in New Jersey. The President of this subsidiary David E. Robinson. This subsidiary has no CEO or Chairman of the Board.

STI Licensing Corporation, a Delaware corporation incorporated on December 16, 1991. CT Corporation is the agent for service for this subsidiary in Delaware. This subsidiary is not licensed to do business in New Jersey. The President of this subsidiary David E. Robinson. This subsidiary has no CEO or Chairman of the Board.

STI Properties, Inc., a Delaware corporation incorporated on December 26, 1972. CT Corporation is the agent for service for this subsidiary in Delaware. This subsidiary is not licensed to do business in New Jersey. The President of this subsidiary David E. Robinson. This subsidiary has no CEO or Chairman of the Board.

2. *If you are identifying a business entity that no longer exists, provide all the information called for in Question 1, except for the agent for service of process. If a business entity conducted business under more than one name, provide each name.*

Not applicable.

3. *If the Company, or any of the business entities identified in Question 1 above, has or had an EPA Identification Number, provide all such numbers and the name of the entity with which they are associated.*

The Company was unable to identify any information relating to the environmental operations or the environmental business records of SP, and specifically was unable to find any information on EPA Identification Numbers (if any) held by SP.

4. *If the Company has at any time leased, maintained, occupied or used any real property at this Site, provide all documentation evidencing such relationship, including deeds, leases, or other such documents that relate to the Site or any portion thereof. Include the numbers and locations of building(s) or areas leased, maintained, occupied or used and the dates of occupation or use by the Company.*

The Company was unable to identify any information regarding SP's involvement with or connection to the Site, and specifically was unable to identify any information regarding SP's lease, occupancy, or other use of the Site.

5. *If the Company had a permit or permits issued pursuant to RCRA during the time it leased, maintained, occupied or used any building or area of the Site, describe when the permit was obtained and what activities were allowed by the permit, and provide a copy of the permit application and the permit.*

The Company was unable to identify any information relating to the environmental operations or the environmental business records of SP or any information regarding SP's involvement with or connection to the Site, and specifically found no information at all regarding RCRA permits, if any, held by SP.

6. *Describe the operations or activities at each building or area of the Site of each business entity identified in Question 1 above. Your description should include, but not be limited to, all manufacturing, research and development, processing and/or handling activities. For each type of operations described in the answer to this Question, provide the name(s), and job descriptions(s) of the person or persons responsible for the management of that*

particular operations or activity. IF such person(s) are no longer employed by the Company, provide their last known address(es).

The Company was unable to identify any information regarding SP's involvement with or connection to the Site, and specifically found no information regarding SP's operations or activities at the Site.

7. *Provide a detailed list of chemicals, including hazardous substances, hazardous wastes and industrial waste materials used, stored, generated or handled by the Company at the Site, and describe the use of each of the chemicals identified. Estimate quantities used on an annual basis and provide the sources of these chemicals at that time. Attach any documents used to prepare the list.*

The Company was unable to identify any information relating to the environmental operations or the environmental business records of SP or regarding SP's involvement with or connection to the Site, and specifically found no information regarding SP's use, storage, generation or handling of hazardous substances, hazardous wastes, and industrial waste materials at the Site.

8. *Provide the analytical results of any analysis the Company performed, or caused to be performed, of hazardous substances, hazardous wastes or industrial waste materials identified in response to Question 7, or any hazardous substances, hazardous wastes and industrial waste materials used, stored, generated or handled at the Site by any person(s) other than the Company.*

The Company was unable to identify any information relating to the environmental operations or the environmental business records of SP or regarding SP's involvement with or connection to the Site, and specifically found no information regarding use, storage, generation or handling by SP or any other person of hazardous substances, hazardous wastes, and industrial waste materials at the Site.

9. *Describe all storage and disposal practices employed by the Company with respect to all hazardous substances, hazardous wastes and/or industrial waste material handled at the Site in any way during the time the Company leased, maintained, occupied or used any real property at the Site. Include all on-site and off-site storage and disposal activities.*

The Company was unable to identify any information relating to the environmental operations or the environmental business records of SP or regarding SP's involvement with or connection to the Site, and specifically found no information regarding SP's handling of hazardous substances, hazardous wastes, and industrial waste materials at the Site or regarding SP's lease, maintenance, occupancy or use of any real property at the Site.

10. *Provide a copy of each document that relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, hazardous wastes and/or industrial waste material identified in response to Questions 6, 7, 8 and 9 above. If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g., letter, file, memo, invoice, inventory form, billing record, hazardous waste manifest, etc.), describe the relevant information contained therein, identify by name and job title the person who prepared the document, and explain where the document is stored and why it is not available.*

The Company was unable to identify any information responsive to this request. See responses to Questions 6, 7, 8, and 9, above.

11. *Identify each person having knowledge of the facts relating to the generation, storage, treatment or disposal of hazardous substances, hazardous wastes or industrial waste materials identified in response to Questions 6, 7, 8 and 9 above. For each person identified, provide the name, address and telephone number of that person and the basis of your belief that he or she has such knowledge.*

The Company was unable to identify any information responsive to this request. See responses to Questions 6, 7, 8, and 9, above.

12. *Provide a copy of any contract, permit or other written agreement entered into by the Company relating to the generation, handling, transport and/or disposal of all hazardous substances, hazardous wastes and/or industrial waste material at the Site. If the documents are not available, refer to Question 10 above, for the specific information required.*

The Company was unable to identify any information relating to the environmental operations or the environmental business records of SP or regarding SP's involvement with or connection to the Site, and specifically found no information regarding agreements relating to the generation, handling, transport or disposal of hazardous substances, hazardous wastes or industrial waste materials at the Site.

13. *Did any leaks and/or spills of any hazardous substances, hazardous wastes and/or industrial waste material occur at the Site? IF so, provide the date(s), response action(s) taken and the ultimate disposal of the hazardous substances, hazardous waste and/or industrial waste material resulting from those leaks and/or spills.*

The Company was unable to identify any information relating to the environmental operations or the environmental business records of SP or regarding SP's involvement with

or connection to the Site, and specifically found no information regarding any leaks or spills occurring at the Site.

14. *Describe any activities by the Company that resulted in the excavation, disturbances or redistribution of soils at the Site.*

The Company was unable to identify any information relating to the environmental operations or the environmental business records of SP or regarding SP's involvement with or connection to the Site, and specifically found no information regarding any excavation, disturbances or redistribution of soils at the Site.

15. *Indicate whether the Company used lagoons, impoundments and/or storage tanks to store, treat and/or dispose of hazardous materials, hazardous waste or industrial waste materials.*

If so, provide the following information:

- a. *The installation date of said unit(s);*
- b. *The use of said unit(s);*
- c. *Whether hazardous substances, hazardous wastes and/or industrial waste material were stored/disposed in said unit(s), and*
- d. *The closure or other final disposition of said unit(s).*

The Company was unable to identify any information relating to the environmental operations or the environmental business records of SP or regarding SP's involvement with or connection to the Site, and specifically found no information regarding lagoons, impoundments and/or storage tanks to store, treat and/or dispose of hazardous materials, hazardous waste or industrial waste materials.

16. *Describe activities and conditions at the Site during the time that the Company leased, maintained, occupied or used a building or area of the Site, including in the building or area occupied by the Company and any other building or area, and indicate what entity or entities undertook these activities. Provide any Site maps that are in the Company's possession, custody or control showing the location of these activities and any other documents describing the buildings or areas where these activities took place.*

The Company was unable to identify any information regarding SP's involvement with operations at, or connection to the Site, and specifically found no information regarding activities and conditions at the Site at any time.

17. *State whether any agreements or contracts (other than insurance policies) exist pursuant to which the Company or its past or present shareholders may be indemnified for any liability that the Company may be found to have under CERCLA for releases and threatened releases of hazardous substances at the Site. If such agreements or contracts exist, provide a copy of the agreements or contracts. If the documents are not available, refer to Question 10 above, for the specific information required.*

The Company was unable to identify any contract that could reasonably be considered to provide such an indemnity.

18. *State whether an insurance policy has ever been in effect pursuant to which the Company may be indemnified for any liability that the Company may be found to have under CERCLA for releases and threatened releases of hazardous substances at the Site. IF any such policies exist, please provide a copy of the policy(ies). In response to this request, provide not only those insurance policies and agreements that currently are in effect, but also those that were in effect during the entire period of the Company's occupation of or operation at the Site. Identify any policy that you cannot locate or obtain by the name of the carrier, years in effect, nature and extent of coverage, and any other information you have.*

The Company was unable to identify insurance policies issued to SP that provided coverage for the period that SP is alleged to have been at the Site.

19. *State whether any of the business entities identified in Question 1 above have filed for bankruptcy and if so, provide the following information:*
- a. *The date of such filing;*
 - b. *The statutory provision under which a petition for bankruptcy was filed (Chapter 7, 11 or 13);*
 - c. *The court whether a petition was filed;*
 - d. *The name, address and telephone number of the bankruptcy trustee;*
 - e. *The disposition of the petition and the date on which it was so disposed; and*

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f. Any other information relevant to aforesaid bankruptcy.

None of the entities identified in Question 1 above have filed for bankruptcy.

20. *Please supply any additional information or documents that may help EPA identify persons who may have been responsible for the release or disposal of hazardous substances, hazardous wastes and/or industrial waste material at the Site.*

The Company has no such information or documents.

21. *State the name(s), address(es), telephone number(s), title(s) and occupation(s) of the person(s) responding to this "Request for Information" or assisting in the preparation of the response, state whether such person(s) has personal knowledge of the information contained in the answers, and specify the question to which each person responded or provided assistances in responding to.*

Mark Bonaguro, Deputy General Counsel (All questions)

One Town Center Road

Boca Raton, FL 33486

Telephone: 561-988-7841

22. *Identify all individuals (other than those identified in your response to Question 21) who may have information or document relating to the subject of this Request for Information, and/or the generation, handling, storage, transportation or disposal of the hazardous substances, hazardous wastes or industrial waste materials that came to be located at the Site.*

None.

Very truly yours,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Kevin D. Margolis

KDM:jc

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CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of Ohio

County of Cuyahoga

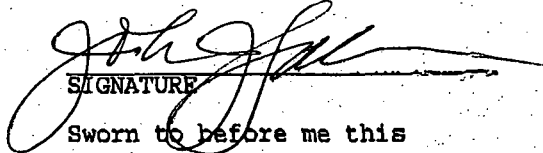
I certify under penalty of law that I have personally examined and am familiar with the Information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

John J. Fahsbender

NAME (print or type)

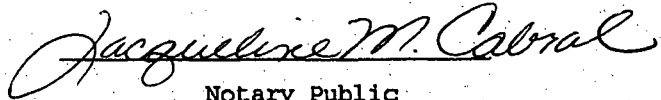
Agent for Scott Technologies, Inc.

TITLE (print or type)


SIGNATURE

Sworn to before me this

7th day of June, 2004


Notary Public

Jacqueline M. Cabral
Notary Public State of Ohio
My Commission Expires December 9, 2008